

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Kristin Worth, Austin Dye,
Axel Anderson, Minnesota Gun
Owners Caucus, Second Amendment
Foundation, Firearms Policy Coalition, Inc.,

Case No. 21-cv-01348 (NEB/LIB)

Plaintiffs,

v.

**SECOND DECLARATION OF
KRISTIN C. NIERENGARTEN**

John Harrington, in his individual
capacity and in his official capacity
as Commissioner of the Minnesota
Department of Public Safety, Don Lorge,
in his official capacity as Sheriff of Mille
Lacs County, Minnesota, Troy Wolbersen,
in his official capacity as Sheriff of
Douglas County, Minnesota, and Dan
Starry, in his official capacity as Sheriff
of Washington County, Minnesota,

Defendants.

I, Kristin C. Nierengarten, declare and state as follows:

1. I am admitted to practice law in the State of Minnesota and before the United States District Court for the District of Minnesota. I am one of the attorneys representing Defendants Don Lorge, in his official capacity as Sheriff of Mille Lacs County, Minnesota, Troy Wolbersen, in his official capacity as Sheriff of Douglas County, Minnesota, and Dan Starry, in his official capacity as Sheriff of Washington

County, Minnesota (collectively, the “County Sheriffs”), in this matter. I make this declaration based upon my personal knowledge.

2. On August 31, 2021, I sent the Solicitor General of the State of Minnesota a tender of defense and indemnification letter pursuant to Minnesota Statutes Section 3.736 on behalf of the County Sheriffs.

3. To date, the State of Minnesota has not provided any response to that letter, nor has it provided defense and indemnification to the County Sheriffs in the present lawsuit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on September 8, 2022.

/s/ Kristin C. Nierengarten
Kristin C. Nierengarten